

1 DIANA G. DICKINSON, ESQ.
Bar No. 13477
2 LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
3 Suite 300
Las Vegas, Nevada 89169.5937
4 Telephone: 702.862.8800
Fax No.: 702.862.8811
5 Email: ddickinson@littler.com

6 Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

7
8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9
10 Kimberly Rogers,

11 Plaintiff,

12 v.

13 Backgroundchecks.com, LLC,

14 Defendant.
15

Case No. 2:22-cv-01102-GMN-EJY

**STIPULATION TO WITHDRAW
VOLUNTARY DISMISSAL WITHOUT
PREJUDICE AND TO DISMISS ENTIRE
ACTION WITH PREJUDICE**

16 Plaintiff KIMBERLY ROGERS (“Plaintiff”) and Defendant
17 BACKGROUNDCHECKS.COM LLC (“BGC”), by and through their respective counsel of record,
18 hereby stipulate and respectfully request that Plaintiff’s Notice of Voluntary Dismissal Without
19 Prejudice (ECF No. 9) be withdrawn, and that this Stipulation to Dismiss the Entire Action With
20 Prejudice be substituted in its place.

21 Plaintiff’s counsel inadvertently filed a notice of voluntary dismissal without prejudice.
22 Plaintiff agreed to dismiss her claims against BGC with prejudice. Accordingly, Plaintiff and BGC
23 respectfully request an order withdrawing the Notice of Voluntary Dismissal Without Prejudice (ECF
24 No. 9) and dismissing the entire action with prejudice.

25 ///

26
27 ///
28

1 Each party shall bear its own costs and fees.

2
3 Dated: June 7, 2023

Dated: June 7, 2023

4 Respectfully submitted,

Respectfully submitted,

5
6 /s/ Michael Kind

7 MICHAEL KIND, ESQ.
KIND LAW

/s/ Diana G. Dickinson

8 DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.

9 GEORGE HAINES, ESQ.
10 GERARDO AVALOS, ESQ.
FREEDOM LAW FIRM, LLC

Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

11 *Attorneys for Plaintiff*
12 KIMBERLY ROGERS

13 **IT IS SO ORDERED.**

14 Dated: 

15 June 14, 2023

16 UNITED STATES DISTRICT JUDGE

17
18 4855-7154-4424.1 / 107811-1021